

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

WINNIE JACKSON, JARRETT “JAY”
JACKSON, CELINA VASQUEZ, DUANE
BRAZTON, NADIA BHULAR, AMJAD
BHULAR, CHERYL MILLS-SMITH, and
RICHARD CANADA,

Plaintiffs,

v.

Civil Case No. 4:25-cv-000587-O

TARRANT COUNTY, TEXAS;
TARRANT COUNTY COMMISSIONERS
COURT; TIM O’HARE, in his official
capacity as Tarrant County Judge,

Defendants.

DEFENDANTS’ MOTION TO DISMISS

Defendants move to dismiss Plaintiffs’ complaint under Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6) because Plaintiffs’ pleadings demonstrate that: (1) this Court lacks subject-matter jurisdiction; (2) Plaintiffs failed to state a claim upon which relief can be granted; and (3) Plaintiffs have failed to state facts supporting a constitutional basis for recovery.

Dated: August 1, 2025

Respectfully submitted,

For the Defendants

/s/ Joseph M. Nixon

Joseph M. Nixon

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CERTIFICATE OF SERVICE

I, Joseph M. Nixon, do hereby certify that service of a true and correct copy of this document has been forwarded to all counsel of record via electronic notification and sent to non-parties via regular and/or certified mail.

DATED: August 1, 2025

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